

Estimate of Reasonable BNYM Defense Costs					
		Lower reasonable estimate (\$)	Lower reasonable estimate (# of hours)	Higher reasonable estimate (\$)	Higher reasonable estimate (# of hours)
Attorney Fees					
Case Assessment					
	Fact Investigation	\$ 600,000	750	\$ 1,200,000	1500
	Analysis/Strategy	\$ 288,000	360	\$ 480,000	600
	Experts	\$ 160,000	200	\$ 320,000	400
	Other	\$ 64,000	80	\$ 128,000	160
		\$ 1,112,000	1390	\$ 2,128,000	2660
Pleadings & Motions					
	MTD	\$ 1,463,200	1829	\$ 1,816,000	2270
	Answer	\$ 232,000	290	\$ 328,000	410
	MTS/MTD	\$ 184,000	230	\$ 240,000	300
	Conferences	\$ 86,400	108	\$ 136,800	171
	Summary Judgment	\$ 1,808,000	2260	\$ 2,864,000	3580
	Other	\$ 96,000	120	\$ 192,000	240
		\$ 3,869,600	4837	\$ 5,576,800	6971
Discovery					
	Fact - Written	\$ 257,600	322	\$ 378,400	473
	Fact - Doc Prod/Review	\$ 2,775,000	*	\$ 4,762,500	**
	Fact - Depositions (40)	\$ 2,880,000	3600	\$ 3,680,000	4600
	Expert	\$ 1,472,000	1840	\$ 2,272,000	2840
	Motions	\$ 249,600	312	\$ 499,200	624
	Other/Misc	\$ 624,000	780	\$ 1,248,000	1560
		\$ 8,258,200		\$ 12,840,100	
Trial					
	Motions & Submissions	\$ 1,120,000	1400	\$ 1,680,000	2100
	Fact witness prep	\$ 800,000	1000	\$ 1,200,000	1500
	Expert witness prep (8)	\$ 768,000	960	\$ 1,024,000	1280
	Mock Trial	\$ 320,000	400	\$ 400,000	500
	Trial (10 days)	\$ 640,000	800	\$ 1,536,000	1920
	Post-trial	\$ 292,800	366	\$ 408,000	510
		\$ 3,940,800	4926	\$ 6,248,000	7810
Appeal		\$ 740,800	926	\$ 1,111,200	1389
Re-trial		\$ 1,970,400	50% trial	\$ 3,124,000	50% trial
Re-appeal		\$ 370,400	50% appeal	\$ 555,600	50% appeal
Fees Total		\$ 20,262,200		\$ 31,583,700	
Expenses					
	Experts	\$ 1,050,000		\$ 2,100,000	
	Paralegals	\$ 1,350,000		\$ 2,025,000	
	Local counsel	\$ 500,000		\$ 1,000,000	
	E-discovery vendor	\$ 500,000		\$ 1,000,000	
	Deposition costs	\$ 144,000		\$ 192,000	
	Jury consultants	\$ 500,000		\$ 1,000,000	
	Puerto Rico travel	\$ 300,000		\$ 600,000	
	Misc	\$ 125,000		\$ 250,000	
Expenses Total		\$ 4,469,000		\$ 8,167,000	
Fees + Expenses Total		\$ 24,731,200		\$ 39,750,700	
* 4500 doc-review atty hrs (\$350) and 1500 blended-rate hrs (\$800)					
** 6750 doc-review atty hrs (\$350) and 3000 blended-rate hrs (\$800)					